

Dated: October 8, 2002

**BEFORE THE
DEPARTMENT OF TRANSPORTATION
WASHINGTON, D.C.**

Application of

ANTONOV DESIGN BUREAU

**for an emergency exemption pursuant to
49 U.S.C. § 40109(g)**

Docket OST-2002-13523

Dated: October 8, 2002

SURREPLY OF NORTHWEST AIRLINES, INC.

Northwest Airlines, Inc. (“Northwest”), submits this Surreply to the Reply filed last night by Antonov Design Bureau (“Antonov”).¹ Northwest is in the final stages of negotiations with ActiveAero, the freight forwarder listed in the Antonov cabotage application, with respect to shipments at issue in this proceeding. Northwest understands other U.S. airlines also are negotiating with ActiveAero regarding such shipments. Given this information and the overall record in this proceeding, the Department cannot conclude that Antonov has satisfied the controlling statutory criteria. Antonov’s emergency cabotage application should be denied.²

¹ To the extent necessary, Northwest requests leave to file this Surreply, to correct factual misstatements contained in Antonov’s Reply filed last night.

² Northwest takes issue with the accusation in Antonov’s Reply that Northwest “piled on” an objection “at the 11th hour”. Northwest advised Antonov’s counsel that Northwest was considering an objection one day after Antonov’s application was filed. Moreover, any delay in Northwest’s objection was caused by factual misstatements in Antonov’s application. Northwest and other U.S. carriers do have aircraft capable of accommodating the shipments, as well as available capacity, and indeed are in final negotiations to do so.

WHEREFORE, Northwest Airlines, Inc. asserts that the Department should deny the Antonov application for emergency cabotage authority.

Respectfully submitted,

/s/Megan Rae Rosia/s/

Megan Rae Rosia

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CERTIFICATE OF SERVICE

I hereby certify that on this 8th day of October, 2002, a copy of the foregoing document of Northwest Airlines, Inc. was served by e-mail or facsimile on the following:

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